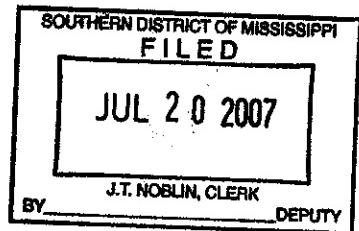


FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

John Hale
Hale 24720
John
SMCI II Po Box 1419 Leakesville MS 39451

(Enter above the full name of the plaintiff or plaintiffs and prisoner number of each plaintiff in this action)



COMPLAINT

v.

CIVIL ACTION NUMBER:

1:07CV956-LGRHW

(to be completed by the Court)

Harrison County
Board of Supervisors
1801 23rd Ave
Gulfport MS 39501

(Enter above the full name of the defendant or defendants in this action)

[more pages attached]
Jury Trial Demanded
Attached
Page

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING:

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

A. Have you ever filed any other lawsuits in a court of the United States? Yes () No ()

B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse side of this page or additional sheets of paper.)

1. Parties to the action: Harrison County et al # 103cv840
State of MS et al # 206cv245

2. Court (if federal court, name the district; if state court, name the county): US, Dist Court L
Southern Division and US Dist Court H-Hiburg D.V.

3. Docket Number: 103cv840 # 206cv245

4. Name of judge to whom case was assigned: Hon. Guirgola JR. Keith Sturges

5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): Still Pending (Both.)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank. Do the same for additional plaintiff, if any.)

I. Name of plaintiff: John Hale Prisoner Number: #24720
 Address: Smct II D2, #25
Po Box 1419
Hockessville MS 39451

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional defendants.)

II. Defendant: Harrison County Board of Supr. is employed as
at 1801 23rd
Ave Gulfport MS 39501

The plaintiff is responsible for providing the court the name and address of each plaintiff(s) as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF(S):

NAME: <u>Harrison Co</u>	ADDRESS: <u>1801 23rd Ave GulfPort MS</u>
<u>Lewellyn Tabave</u>	<u>10451 Larkin Smith DR Gulfport MS</u>
<u>Sheriff George Payne</u>	<u>10451 Larkin Smith DR Gulfport MS</u>
<u>T.P. Willis</u>	

DEFENDANT(S): (Each officially and Individually)

NAME: <u>Harrison Co Supr.</u>	ADDRESS: <u>1801 23rd Ave GulfPort MS</u>
<u>Sheriff George Payne</u>	<u>10451 Larkin Smith DR Gulfport MS</u>
<u>Officer Lewellyn Tabave</u>	<u>10451 Larkin Smith DR Gulfport MS</u>
<u>Officer E.Tarpley #267</u>	<u>10451 Larkin Smith DR GulfPort MS</u>
<u>T.P. Willis</u>	<u>10451 Larkin Smith DR GulfPort MS</u>
<u>Morgan L Thompson</u>	<u>10451 Larkin Smith DR Gulfport MS</u>
<u>James Gaston</u>	<u>10451 Larkin Smith DR Gulfport MS</u>

See Attached Page

Defendants

Dixie Burtucie

Probation office

lymuse st

Biloxi ms

Rondalyn Rogers

10451 harkin smith DR

Gulfport ms ~~3905~~ 39501

Officer John Doe

10451 harkin Smith DR

Gulfport ms ~~3905~~ 39501

Mississippi Enuity Insurance

Company

Po Box 27904

Jackson ms 39621

John & Jane Does

Not Known at This
Time

10451 harkin Smith DR

Gulfport ms 39501

ADMINISTRATIVE REMEDIES PROGRAM

A. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?

Yes () No ()

B. Are you presently incarcerated for a parole or probation violation?

Yes () No ()

C. Did you present the facts relating to your complaint in the administrative or grievance procedure in your institution?

Yes () No () NONE Available

1. If you answer to C is yes,

a. State the date your claims were presented: NA

b. State how your claims were presented. (Written request; verbal request; request for forms)
NA

c. State the result of that procedure. (You must attach a copy of the final result, such as a certificate from the administrator of the Administrative Remedies Program stating that you have exhausted your administrative remedies.)
NA

2. If you have not filed a grievance, state the reasons: NONE Available for These violations

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet if necessary.)

This Claim is Based on (1983, 1986
 Civil Conspiracy 1985(a) Obstruction of
 Justice and 1st Amendment Interference
 & Access To The Courts I Learned For
 Sure That I had This Claim 2, 6, 2007
 When I Received The Docket Report
 from The Court, I have Previously Been
 Diligently Trying To find out About This Claim
 See Statement of Facts, (Redacted)
 I Also would Includ State law Claims where Applicable)

RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

Demand, Jury Trial

1,000,000⁰⁰ for Compensary from each and all Defendants
 1,000,000⁰⁰ for Punitive from each and all Defendants
 Each In Their Individual and Official
 Capacitys, any State law Relief Available

Signed this 11th day of July , 20 07

John Hale
 Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

7/11/07
 (Date)

John Hale
 Signature of plaintiff(s)

Statement of Facts,

- (1) In June 2005 I Gave Office Labave a Reply To DR Comptons Motion for Summary Judgment with Exhibits and Affidavits I Supplied Two Stamped Addressed Envelopes So Officer Labave Could mail The Pleadings To The Court, The 2nd Envelope was for The Court To mail my hand Copied Pleading To me at The Hinds County Restitution Center Officer Labave Never Mailed it, Thus Violating my Right of Access To The Court and (1985) Obstruting Justice.
- (2) Officer T.P. Willis on July 15 The day I Returned To The Harrison County Jail From The Restitution Center Took my legal Work as I Was being booked back in, T.P. Willis Obstruted my Access By Keeping my legal Work from me for Approximately five months Officer Willis Conspired with Booking Officers E. Tarpley Badge #267, and Morgan L. Thompson To Keep my legal Work from me Thus violating The Constitution under Color of Law By Interfering with my Access To The Court and obstruting Justice
- (3) At The end of July I Gave a Summary Judgment Reply for Riley, Rogers, TP Willis,

Kenny Roger, Eddie Collins I Gave These Pleadings
To an officer who I only know as Even if
Was Not mailed agin Obstructing Justice
and my Access To The Court,

(4) James Gaston And Dixie Burtucie
Conspired To have my Post Release
Supervision Revoked In Retaliation for
my Civil Action. Gaston had NO other
Reason To beat my Revocation Hearing
But To Tell Dixie Burtucie About my Civil
Suite, Dixie Burtucie had NO Reason TO
Bring my Civil Action up To The Court as
it had Nothing To Do with my Being sent
Back from The Restitution Center, I was
sent BACK for Medical Reasons with
The Recomondation from Commander Robins
To be Released To seek Treatment &
The V.A. I Did NOT violate any Rules
and would NOT have been Revoked the
Only Reason I Was was Due To The Agree
ment Between gaston and Burtucie.
Violating my 1st Amendment Right of
Access To The Court and Obstructing Justice
Under 1985 (2)

(5) Sheriff George Payne New of and
Approved OF The Violations and obstruct-
- ing (2)

Of Justice Sheriff George Payne was
In The Conspiracy with James Easton
To Keep me from The Courts, he violated
my Rights under 1985(2) As Was The
Custom at The Jail.

(6) Rhondalyn Rogers Retaliated against me for
my Civil Action Against her on 7,21,06
MS Rogers Refused To Submit my
Completion Of The Good News Bible Study
Correspondence Course To MDOC for The
Eligability OF MET Time, her Only
Motive in This Denial Was To Retaliate
for My Civil Action Against her its
Not her decision as to wether I earn
MET Time its The MDOC who decides
Not MS Rogers See SOP. #0; 15-03-01
MDOC Policy and Statute 47-5-142, MS
Rogers Retaliation Violates The 1st Amendment
of The Constitution,

(7) The Harrison County Board of
Supervisors have Known about The
Violations at The Jail for years
as its Been The Custom and Practice
at The Jail To NOT Provide Adequate
Medical Care, Obstruct Access To The
Courts By Taking of Legal Work and

Not Mailing my Pleadings To The Court. The Defendants have aided and abetted Each Other Causing The Constitutional Violations At The Jail To Persist for years They were wide spread Abuses That Spread Throughout The Whole Sheriffs Department Theres been a High degree of Plybility Concerning The Jail The Board of Supervisor had Knowledge of The Abuses at The Jail yet Remained Deliberately Indifferent,

My Claim is Forward looking and Backward looking The violations of my Rights have Been Ongoing and Continuing The Frauds & Conspiracys of The Defendants, The Not mailing Of my Pleadings have Violated my Right of Access To The Court, Each Named Defendant Above agreed To and did Interfere with my Access To The Courts and Caused Injury To my Underling Claims The Cover up in Fact Presudiced my Ability To Seek Redress, They Acted With Deliberet Intent To Thwart vindication of my Rights

The Frauds and Conspiracys under 1985 (a)
To Deny me Access To The Court Toll The Statute of Limitations, The Fact That The violations have Been Continuing and on going toll The Statute of Limitations my Access To The Court Was Impeded Before I filed my claim and

End GII During The Pursuit of Said Claim Rhonda Lyn Rogers Retaliated against me In 2006 Contrary To Violate my Right To Access; The Conspiracy Of Gaston & Dixie Burtruz Are Affecting me This Very minute. I Would NOT Be here if NOT for There Retaliatory Actions As Judge Ulhos Was going To Release me To seek Treatment at The V.A Hospital

The Harrison County Sheriffs Dept Ryas a Close And To Grand Staff as The Whole DePL has Run amuck ~~at~~ for years and have gotten away with it I am Surprised That They hadn't killed some one Before Jessie L. Williams

The Consent Order Required The Defendants TO Improve Access To The Courts But Instead They Denied me and many other pro-se Inmates like me ACCESS TO The Court By Taking of Legal Pleadings and Not Mailing Them TO The Court,

Respectfully Submitted Under Penalty of Perjury This The 11th day of July

2007 By John Hale

John Hale #24720